

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
EASTERN DIVISION**

JOHN BARNHARDT, et al.

PLAINTIFFS

and

UNITED STATES OF AMERICA

PLAINTIFF-INTERVENOR

V.

**CIVIL ACTION NO. 45:65cv1300-HTW-LRA
(formerly 1300(E))**

**MERIDIAN MUNICIPAL SEPARATE
SCHOOL DISTRICT, et al.**

DEFENDANTS

MOTION FOR PROTECTIVE ORDER

Comes now Defendant Meridian Municipal Separate School District, now known as the Meridian Public School District (“District”), and moves the Court for a protective order to protect the confidentiality of student names and any other personal student identifiers contained in documents that the District has produced in response to the United States’ recent discovery requests in the case.

1. By Order of August 10, 2011, this Court granted the United States’ motion to compel discovery, ordering the Defendant District to respond to discovery requests by the United States in the case. As of today, the District has responded to the requests. Included in the responsive information are documents regarding student discipline, Bates Nos. MSD 000001—031904, 033957-035557, and 03558-036128 which contain student names or other personal student identifiers.

2. The District hereby designates all student names and any other personal student identifiers in the documents as “confidential.” The portions of the documents naming or identifying any particular student should be kept confidential, secure, and used solely for the

purposes of this litigation and for no other purpose. Such confidential information shall be made available only to “Qualified Persons” and used and protected as provided in the proposed Protective Order which is attached as Exhibit A to this motion.

Respectfully submitted this the 12th day of September, 2011.

MERIDIAN PUBLIC SCHOOL DISTRICT

By: /s/ Holmes S. Adams

One of Its Attorneys

OF COUNSEL:

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CERTIFICATE OF SERVICE

I, Holmes S. Adams, counsel for the District, certify that a true and correct copy of the above and foregoing has been forwarded to the following persons:

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Allison R. Brown
Ryan C. Wilson
United States Department of Justice
Civil Rights Division
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Patrick Henry Building, Suite 4300
Washington, DC 20530

This the 12th day of September, 2011.

/s/ Holmes S. Adams
Holmes S. Adams